

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

MEGAN PETE, an individual

Civil Action No. 1:24-cv-24228

Plaintiff,

v.

MILAGRO ELIZABETH COOPER,
an individual,

JURY TRIAL DEMANDED

Defendant.

**MOTION TO APPEAR *PRO HAC VICE*,
CONSENT TO DESIGNATION, AND REQUEST TO
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rules 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of Julian Schoen, Esquire of the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, 865 S. Figueroa Street, 10th Floor, Los Angeles, California 90017; telephone number: 213-443-3000; email address: julianschoen@quinnemanuel.com, for purposes of appearance as co-counsel on behalf of Plaintiff Megan Pete in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Julian Schoen, Esquire to receive electronic filings in this case, and in support thereof states as follows:

1. Julian Schoen is not admitted to practice in the Southern District of Florida and is a member in good standing of the State Bar of California.

2. Movant, Daniel L. Humphrey, Esquire, of the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, 2601 S. Bayshore Drive, Suite 1550, Miami, Florida 33133; telephone number: 305-402-4880, is a member in good standing of The Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Julian Schoen, Esquire has made payment of this Court's \$200.00 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. Julian Schoen, Esquire, by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Julian Schoen, Esquire at email address: julianschoen@quinnemanuel.com.

WHEREFORE, Daniel L. Humphrey, Esquire, moves this Court to enter an Order Julian Schoen, Esquire, to appear before this Court on behalf of Plaintiff Megan Pete, for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Julian Schoen, Esquire.

Dated: November 5, 2024

Respectfully submitted,

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

/s/ Daniel L. Humphrey

Olga Viera (Fla. Bar No. 29783)

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**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

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Attorneys for Plaintiff Megan Pete

CERTIFICATE OF SERVICE

I hereby certify that on November 5, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing is being served this day on all counsel of record in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel who are not authorized to receive Notice of Electronic Filing.

By: /s/ Daniel L. Humphrey

Daniel L. Humphrey

Fla. Bar No. 1024695